

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,

Plaintiff,

v.

COMMSCOPE HOLDING COMPANY,
INC., COMMSCOPE, INC., ARRIS US
HOLDINGS, INC., ARRIS SOLUTIONS,
INC., ARRIS TECHNOLOGY, INC., and
ARRIS ENTERPRISES, LLC,

Defendants.

Civil Action No.: 2:21-cv-00310-JRG

**DECLARATION OF ANDREW S. ONG IN SUPPORT OF
COMMSCOPE'S MOTION TO EXCLUDE CERTAIN
UNRELIABLE OPINIONS OF PLAINTIFF'S EXPERT DR. JONATHAN PUTNAM**

I, Andrew S. Ong, declare:

1. I am a partner at Goodwin Procter LLP, counsel of record for Defendants CommScope Holding Company, Inc., CommScope Inc., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology (collectively, "CommScope"). I am over the age of 18 years, have personal knowledge of the matters in this declaration, and if called as a witness, I would and could competently testify to them.

2. Attached hereto as **Exhibit A** is a true and correct copy of the Corrected Expert Report of Jonathan D. Putnam dated September 3, 2022.

3. Attached hereto as **Exhibit B** is a true and correct copy of the Supplemental Expert Report of Jonathan D. Putnam dated November 16, 2022.

4. Attached hereto as **Exhibit C** is a true and correct copy of the Second Supplemental Expert Report of Jonathan D. Putnam dated December 1, 2022.

5. Attached hereto as **Exhibit D** is a true and correct copy of excerpts from the deposition transcript of Jonathan D. Putnam dated December 6, 2022.

6. Attached hereto as **Exhibit E** is a true and correct copy of the [REDACTED]
[REDACTED] and
produced at TQD_TX00491589-641.

7. Attached hereto as **Exhibit F** is a true and correct copy of excerpts from the deposition transcript of Jonathan D. Putnam for Family 2 in *TQ Delta, LLC v. 2Wire, Inc.*, C.A. No. 13-cv-1835-RGA (D. Del.) (“2Wire”) dated February 7, 2019.

8. Attached hereto as **Exhibit G** is a true and correct copy of excerpts from Plaintiff TQD’s Objections and Responses to CommScope’s First Set of Interrogatories (Nos. 1–35) dated May 12, 2022.

9. Attached hereto as **Exhibit H** is a true and correct copy of the [REDACTED]
[REDACTED] and produced
at TQD_TX-00044425–446.

10. Attached hereto as **Exhibit I** is a true and correct copy of the [REDACTED]
[REDACTED] and produced
at TQD_TX-00044309–330.

11. Attached hereto as **Exhibit J** is a true and correct copy of the [REDACTED]
[REDACTED] dated December 27,
2019 and produced at TQD_TX-00044447–505.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 14, 2022, in San Francisco, California.

/s/ Andrew S. Ong
Andrew S. Ong